

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address Philip D. Dracht (219044) Dracht Law, PC 15 W. Carrillo St. Santa Barbara, CA 93202 pdracht@drachtlaw.com Telephone: (805) 979-8802	FOR COURT USE ONLY
<input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: Plaintiff Jason M. Rund	
<b>UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION</b>	
In re: YOUTH POLICY INSTITUTE, INC.,  <div style="text-align: right;">Debtor(s).</div>	CASE NO.: 2:19-bk-23085-BB  ADVERSARY NO.: 2:21-ap-01221-BB  CHAPTER: 7
JASON M. RUND, Chapter 7 Trustee   <div style="text-align: right;">Plaintiff(s).</div> <div style="text-align: center;">vs.</div> DIXON SLINGERLAND; STEVEN SCHULTZ; SUZANNE STEINKE; SUZANNE M. STEINKE A PROFESSIONAL CORPORATION; HILL MORGAN AND ASSOCIATES, LLP <div style="text-align: right;">Defendant(s).</div>	<div style="text-align: center;"> <b>JOINT STATUS REPORT [LBR 7016-1(a)(2)]</b> </div> <div style="padding-top: 10px;">           DATE: 11/14/2022            TIME: 2:00 p.m.            COURTROOM: 1539            ADDRESS: 255 E Temple St., Ctrm 1539, Los                              Angeles, CA 90012         </div>

The parties submit the following JOINT STATUS REPORT in accordance with LBR 7016-1(a)(2):

**A. PLEADINGS/SERVICE:**

- |  |   |
|--|---|
| 1. Have all parties been served with the complaint/counterclaim/cross-claim, etc.<br>(Claims Documents)? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 2. Have all parties filed and served answers to the Claims Documents?                                    | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 3. Have all motions addressed to the Claims Documents been resolved?                                     | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 4. Have counsel met and conferred in compliance with LBR 7026-1?   | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

5. If your answer to any of the four preceding questions is anything other than an unqualified "YES," please explain below (*or on attached page*):

**B. READINESS FOR TRIAL:**

1. When will you be ready for trial in this case?

Plaintiff  
November 2023

Defendant  
November 2023

2. If your answer to the above is more than 4 months after the summons issued in this case, give reasons for further delay.

Plaintiff  
Parties have been attempting to mediate a resolution of this dispute

Defendant  
Parties are in mediation. The Debtor is defunct. Extensive third party discovery, as well as expert witness discovery will be required.

3. When do you expect to complete your discovery efforts?

Plaintiff  
30 days prior to trial

Defendant  
Fact discovery - 60 days prior to trial  
Expert Witness discovery - 30 days prior to trial

4. What additional discovery do you require to prepare for trial?

Plaintiff  
Depositions of defendants; third party depositions; additional time beyond 7 hours for the depositions of Defendants Slingerland and Schultz (Rule 30(d)(1); 3rd Party depositions of DOE representatives

Defendant  
Numerous depositions and third party subpoenas. Written discovery to Plaintiff. Expert discovery; It is premature to address the need for more than 7 hours for Schultz and/or Slingerland's depositions

**C. TRIAL TIME:**

1. What is your estimate of the time required to present your side of the case at trial (*including rebuttal stage if applicable*)?

Plaintiff  
Unknown because of limited discovery

Defendant  
Unknown because of limited discovery to date.

2. How many witnesses do you intend to call at trial (*including opposing parties*)?

Plaintiff  
Unknown because of limited discovery

Defendant  
Unknown because of limited discovery to date.

3. How many exhibits do you anticipate using at trial?

Plaintiff

Defendant

Unknown at this time given uncertainties as to factual  
and foundational stipulations

Unknown

**D. PRETRIAL CONFERENCE:**

A pretrial conference is usually conducted between a week to a month before trial, at which time a pretrial order will be signed by the court. [See LBR 7016-1.] If you believe that a pre-trial conference is not necessary or appropriate in this case, please so note below, stating your reasons:

Plaintiff

Pretrial conference ☒ is ☐ is not requested  
Reasons:

Defendant

Pretrial conference ☒ is ☐ is not requested  
Reasons:

Plaintiff

Pretrial conference should be set after:  
(date) 09/01/2023

Defendant

Pretrial conference should be set after:  
(date) \_\_\_\_\_

**E. SETTLEMENT:**

1. What is the status of settlement efforts?

The parties continue to mediate the dispute. The parties will inform the Court of the settlement status at the hearing

2. Has this dispute been formally mediated? ☒ Yes ☐ No  
If so, when?  
May 2, 2022 and continuing.

3. Do you want this matter sent to mediation at this time?

Plaintiff

☐ Yes ☒ No

Defendant

☐ Yes ☒ No

**F. FINAL JUDGMENT/ORDER:**

Any party who contests the bankruptcy court's authority to enter a final judgment and/or order in this adversary proceeding must raise its objection below. Failure to select either box below may be deemed consent.

Plaintiff

☒ I do consent

☐ I do not consent

to the bankruptcy court's entry of a final judgment  
and/or order in this adversary proceeding.

Defendant

☐ I do consent

☒ I do not consent

to the bankruptcy court's entry of a final judgment  
and/or order in this adversary proceeding.

**G. ADDITIONAL COMMENTS/RECOMMENDATIONS RE TRIAL: (Use additional page if necessary)**

Counsel for Plaintiff has determined that given the complexity of the factual allegations, the potential defenses, and the number corroborating witnesses and documents, that a truncated trial schedule is simply not possible under the circumstances.

Respectfully submitted,

Date: 11/01/2022

Dracht Law, PC

Printed name of law firm

/s/Philip D. Dracht

Signature

Philip D. Dracht

Printed name

Attorney for: Plaintiff Jason M. Rund

Date: 11/01/2022

Law Offices of Steven Goldsobel, APC

Printed name of law firm

s/ Steven Goldsobel \*\*

Signature

Steven M. Goldsobel

Printed name

Attorney for: Steven Schultz

\*\* Filing counsel has consent to e-file signature and will retain those records as required by local rules

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
15 W. Carrillo St. Santa Barbara, CA 93101

A true and correct copy of the foregoing document entitled: **JOINT STATUS REPORT [LBR 7016-1(a)(2)]** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On *(date)* 11/01/2022, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Keith Patrick, Banner, Philip D. Dracht, Steven Goldsobel, Hayes F. Michel, Christopher E. Prince, Summer M. Shaw

☐ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On *(date)* 11/01/2022, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Judge Sheri Bluebond, U.S. Bankruptcy Court Roybal Federal Building, 255 E. Temple Street, Suite 1534; Los Angeles, CA 90012

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on *(date)* \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

11/01/2022  
Date

Philip D. Dracht  
Printed Name

/s/Philip D. Dracht  
Signature

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This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.